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**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS (EASTERN DIVISION)**

**DIRECTV, Inc.**

Plaintiff,

vs.

**Dominic J. Venturelli**

Defendant

) **CIVIL ACTION NO. 04-10159 PBS**

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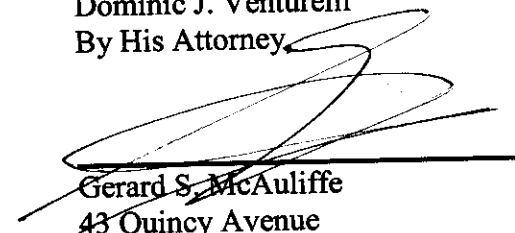
**ASSENTED TO MOTION TO EXTEND  
TIME**

Now comes the defendant in the above-titled action, and respectfully moves this Court for an order granting that all dates contained in the Scheduling Order entered on June 17, 2004, be extended for a period of sixty (60) days. The defendant asserts that he is in the process of obtaining new counsel and the time is needed for new counsel to prepare for the case. As further grounds, please see the affidavit of Attorney Gerard S. McAuliffe.

Wherefore, the Plaintiff moves this court for to extend discovery deadlines 60 days.

Respectfully submitted for the Defendant,  
Dominic J. Venturelli  
By His Attorney,

8/30/04  
Date

  
Gerard S. McAuliffe  
43 Quincy Avenue  
Quincy, MA 02169  
617-471-0700

**Certification pursuant to LR D. Mass 7.1 (A) (2)**

Defendant's counsel certifies that he spoke to the Plaintiff's Attorney and the Plaintiff fully assents to this motion. Plaintiff's counsel has agreed to put off his discovery pending the appearance of new counsel for the Defendant.

**CERTIFICATE OF SERVICE**

I, Gerard S. McAuliffe, attorney for the Defendant, hereby certify that on the 30<sup>th</sup> day of August 2004, I served a copy of the foregoing Motion for Extension of Time via first-class mailing to:

John M. McLaughlin  
McLaughlin Sacks, LLC  
31 Trumbull Road  
Northampton, MA 01060

  
Gerard S. McAuliffe